

Paul J. Riehle (SBN 115199)
paul.riehle@faegredrinker.com
FAEGRE DRINKER BIDDLE & REATH LLP
Four Embarcadero Center, 27th Floor
San Francisco, CA 94111
Telephone: (415) 591-7500

Christine A. Varney (*pro hac vice*)
cvarney@cravath.com
CRAVATH, SWAINE & MOORE LLP
825 Eighth Avenue
New York, New York 10019
Telephone: (212) 474-1000

Counsel for Plaintiff Epic Games, Inc.

Douglas J. Dixon (SBN 275389)
ddixon@hueston.com
HUESTON HENNIGAN LLP
620 Newport Center Drive, Suite
1300
Newport Beach, CA 92660
Telephone: (949) 229-8640

*Counsel for Plaintiffs Match
Group, LLC, et al.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE GOOGLE PLAY STORE
ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

Epic Games Inc. v. Google LLC et al.,
Case No. 3:20-cv-05671-JD

*Match Group, LLC et al. v. Google LLC et
al.*, Case No. 3:22-cv-02746-JD

Case No. 3:21-md-02981-JD

**DECLARATION OF LAUREN A.
MOSKOWITZ IN SUPPORT OF
EPIC'S AND MATCH'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIALS SHOULD BE
SEALED**

Date: November 17, 2022 at 10:00 a.m.
Courtroom: 11, 19th Floor
Judge: Hon. James Donato

1 I, Lauren A. Moskowitz, declare as follows:

2 1. I am a partner at Cravath, Swaine & Moore LLP, counsel to Epic Games, Inc.
3 (“Epic”) in the above-captioned actions. I am admitted to appear before this Court *pro hac vice*.

4 2. I submit this declaration pursuant to Civil Local Rule 79-5. The contents of this
5 declaration are based on my personal knowledge.

6 3. Epic’s and Match’s Notice of Motion and Motion to Amend Complaints (the
7 “Motion to Amend”), the Declaration of Michael J. Zaken (“Zaken Declaration”) and the
8 accompanying exhibits (“Exhibits”) contain portions that are sourced from materials that
9 Defendants Google LLC, Google Ireland Limited, Google Commerce Limited, Google Asia
10 Pacific Pte. Limited, and Google Payment Corp. (collectively, “Google”), and non-party
11 Activision Blizzard, Inc., have designated as “CONFIDENTIAL”, “HIGHLY CONFIDENTIAL
12 – ATTORNEYS’ EYES ONLY” or “NON-PARTY HIGHLY CONFIDENTIAL – OUTSIDE
13 COUNSEL EYES ONLY”, pursuant to the operative Protective Orders entered by the Court,
14 Case No. 3:21-md-02981-JD, ECF Nos. 247, 248, and 249. The following table shows the
15 portions of Epic’s and Match’s Motion, the Zaken Declaration and its Exhibits that contain
16 information designated as “CONFIDENTIAL”, “HIGHLY CONFIDENTIAL – ATTORNEYS’
17 EYES ONLY” or “NON-PARTY HIGHLY CONFIDENTIAL – OUTSIDE COUNSEL EYES
18 ONLY”.

Document	Portion Containing Designated Information	Designating Party
Epic's and Match's Notice of Motion and Motion to Amend Complaints ("Epic and Match's Motion")	Page 1, Lines 10-11	Google
Epic's and Match's Motion	Page 1, Line 24	Google
Epic's and Match's Motion	Page 1, Line 28 - Page 2, Line 1	Google
Epic's and Match's Motion	Page 2, Line 10-11	Google
Epic's and Match's Motion	Page 2, Line 15	Activision Blizzard, Inc.
Epic's and Match's Motion	Page 2, Line 17	Google
Epic's and Match's Motion	Page 3, Line 19 (two words after "deal")	Google
Epic's and Match's Motion	Page 3, Lines 20-21	Google
Epic's and Match's Motion	Page 3, Lines 23-24 (from after "paid" to next comma)	Google
Epic's and Match's Motion	Page 3, Lines 24-25 (from after "developer that" to end of quote)	Google
Epic's and Match's Motion	Page 3, Line 25 (single word after "Ex. H")	Google
Epic's and Match's Motion	Page 4, Lines 1-2	Google
Epic's and Match's Motion	Page 4, Lines 6-8	Google
Epic's and Match's Motion	Page 4, Lines 10-11 (from after "deposition of" to the comma)	Google
Epic's and Match's Motion	Page 4, Line 12 (six words after "deposition of")	Activision Blizzard, Inc.
Epic's and Match's Motion	Page 4, Lines 12-13 (last three words of Line 12 to period)	Google
Epic's and Match's Motion	Page 4, Line 14	Google
Epic's and Match's Motion	Page 4, Lines 15-18	Google
Epic's and Match's Motion	Page 4, Line 19 (Single word after "Ex. I")	Google

1	Epic's and Match's Motion	Page 4, Line 19 (first two words after "Similarly,")	Google
2	Epic's and Match's Motion	Page 4, Lines 20-21 (stop at first period)	Google
3	Epic's and Match's Motion	Page 4, Line 21 (single word after "Ex. I")	Google
4	Epic's and Match's Motion	Page 4, n.3 (words 1-2)	Google
5	Epic's and Match's Motion	Page 4, n.3 (first two words of second sentence)	Google
6	Epic's and Match's Motion	Page 4, n.3 (first word after "negotiations with")	Google
7	Epic's and Match's Motion	Page 4, n.3 (first word after "Ex. I")	Google
8	Epic's and Match's Motion	Page 4, n.4 (words 5-6)	Activision Blizzard, Inc.
9	Epic's and Match's Motion	Page 4, n.4 (single word after "but")	Activision Blizzard, Inc.
10	Epic's and Match's Motion	Page 5, Line 1 (two words before "admitted")	Google
11	Epic's and Match's Motion	Page 5, Lines 1-4 (from after "admitted" to next period)	Google
12	Epic's and Match's Motion	Page 5, Line 4 (single word after "Ex. I")	Google
13	Epic's and Match's Motion	Page 5, Line 5 (words 2-3)	Activision Blizzard, Inc.
14	Epic's and Match's Motion	Page 5, Lines 5-7 (after "testified that")	Activision Blizzard, Inc.
15	Epic's and Match's Motion	Page 5, Line 8 (word 1)	Activision Blizzard, Inc.
16	Epic's and Match's Motion	Page 5, Lines 8-9 (after "However")	Activision Blizzard, Inc.
17	Epic's and Match's Motion	Page 5, Lines 10-11 (from "(Id.)" to next period)	Activision Blizzard, Inc.
18	Epic's and Match's Motion	Page 5, Line 11 (single word after "Ex. J")	Activision Blizzard, Inc.
19	Epic's and Match's Motion	Page 5, Lines 13-14 (last word Line 13 and first on Line 14)	Google

1	Epic's and Match's Motion	Page 5, Line 14 (words 3-4)	Activision Blizzard, Inc.
2	Epic's and Match's Motion	Page 5, Lines 20-21	Google
3	Epic's and Match's Motion	Page 5, Lines 23-24 (to ellipses)	Google
4	Epic's and Match's Motion	Page 5, Lines 24-26 (after "[but]" to next ellipses)	Activision Blizzard, Inc.
5	Epic's and Match's Motion	Page 5, Line 26 (after "[and]" to period)	Google
6	Epic's and Match's Motion	Page 6, Line 1	Activision Blizzard, Inc.
7	Epic's and Match's Motion	Page 6, Lines 3-4 (first line of block quote)	Google
8	Epic's and Match's Motion	Page 6, Lines 5-8 (block quote after "revealed that" to close of quotation)	Activision Blizzard, Inc.
9	Epic's and Match's Motion	Page 9, Line 2	Activision Blizzard, Inc.
10	Epic's and Match's Motion	Page 10, Line 10	Activision Blizzard, Inc.
11	Epic's and Match's Motion	Page 9, Line 2	Activision Blizzard, Inc.
12	Epic's and Match's Motion	Page 10, Line 10	Activision Blizzard, Inc.
13	Declaration of Michael J. Zaken in support of Epic's and Match's Notice of Motion and Motion to Amend Complaints ("Zaken Declaration")	¶ 5	Google
14	Zaken Declaration	¶ 6	Google
15	Zaken Declaration	¶ 7	Google
16	Zaken Declaration	¶ 8	Google
17	Zaken Declaration	¶ 9	Google
18	Zaken Declaration	¶ 10	Google
19	Zaken Declaration	¶ 11	Google
20	Zaken Declaration	¶ 12	Activision Blizzard, Inc.
21	Zaken Declaration	¶ 17	Google
22	Zaken Declaration	¶ 18, Line 14 (words 3-5 of line)	Google
23			
24			
25			
26			
27			
28	DECL. OF LAUREN A. MOSKOWITZ IN SUPPORT OF EPIC'S AND MATCH'S ADMINISTRATIVE MOTION	5	CASE NO. 3:21-MD-02981-JD

	Zaken Declaration	¶ 18, Line 14 (last three words of line)	Activision Blizzard, Inc.
1	Exhibit A to the Zaken Declaration	¶ 198	Google
2	Exhibit A to the Zaken Declaration	¶ 199	Google
3	Exhibit A to the Zaken Declaration	¶ 200	Google
4	Exhibit A to the Zaken Declaration	¶ 201	Google
5	Exhibit A to the Zaken Declaration	¶ 202	Google
6	Exhibit A to the Zaken Declaration	¶ 208	Google
7	Exhibit A to the Zaken Declaration	¶ 209	Google
8	Exhibit A to the Zaken Declaration	¶ 213	Google
9	Exhibit A to the Zaken Declaration	¶ 214	Google
10	Exhibit B to the Zaken Declaration	¶ 198	Google
11	Exhibit B to the Zaken Declaration	¶ 199	Google
12	Exhibit B to the Zaken Declaration	¶ 200	Google
13	Exhibit B to the Zaken Declaration	¶ 201	Google
14	Exhibit B to the Zaken Declaration	¶ 202	Google
15	Exhibit B to the Zaken Declaration	¶ 208	Google
16	Exhibit B to the Zaken Declaration	¶ 209	Google
17	Exhibit B to the Zaken Declaration	¶ 213	Google
18	Exhibit B to the Zaken Declaration	¶ 214	Google
19	Exhibit C to the Zaken Declaration	Document in its entirety	Google
20	Exhibit D to the Zaken Declaration	Document in its entirety	Google
21	Exhibit E to the Zaken Declaration	Document in its entirety	Google
22	Exhibit F to the Zaken Declaration	Document in its entirety	Google
23	Exhibit G to the Zaken Declaration	Document in its entirety	Google
24	Exhibit H to the Zaken Declaration	Document in its entirety	Google
25	Exhibit I to the Zaken Declaration	Document in its entirety	Google
26	Exhibit J to the Zaken Declaration	Document in its entirety	Activision Blizzard, Inc.
27	Exhibit K to the Zaken Declaration	¶ 273	Google
28	Exhibit K to the Zaken Declaration	¶ 274	Google
	Exhibit K to the Zaken Declaration	¶ 275	Google
	Exhibit K to the Zaken Declaration	¶ 276	Google

1	Exhibit K to the Zaken Declaration	¶ 277	Google
2	Exhibit K to the Zaken Declaration	¶ 283	Google
3	Exhibit K to the Zaken Declaration	¶ 284	Google
4	Exhibit K to the Zaken Declaration	¶ 288	Google
5	Exhibit L to the Zaken Declaration	¶ 273	Google
6	Exhibit L to the Zaken Declaration	¶ 274	Google
7	Exhibit L to the Zaken Declaration	¶ 275	Google
8	Exhibit L to the Zaken Declaration	¶ 276	Google
9	Exhibit L to the Zaken Declaration	¶ 277	Google
10	Exhibit L to the Zaken Declaration	¶ 283	Google
11	Exhibit L to the Zaken Declaration	¶ 284	Google
12	Exhibit L to the Zaken Declaration	¶ 288	Google

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that I executed this declaration on October 7, 2022 in New York, New York.

/s/ Lauren A. Moskowitz

Lauren A. Moskowitz